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VIA ECF

The Honorable Lorna G. Schofield
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *The Estate of Michael Heiser, et al. v. JPMorgan Chase Bank, N.A.*, Case No. 11-cv-1606


Dear Judge Schofield:

This firm is counsel to petitioners The Estate of Michael Heiser, et. al. (the "Heisers") in the above-referenced proceeding. By Stipulation endorsed December 7, 2011, this proceeding was stayed pending the outcome of *Levin v. Bank of New York, et al.*, Case No. 09-Civ-05900 (S.D.N.Y.) (the "Levin Action"). This letter is being provided on behalf of the Heisers and respondent JPMorgan Chase Bank, N.A. ("JPMorgan") in response to this Court's Order dated October 31, 2014, that the parties file monthly joint status reports until the Levin Action is completed.

As set forth in our previous status letters, the Levin judgment creditors have identified two assets held by JPMorgan which they are now pursuing. On April 18, 2017, the court in the Levin Action directed the clerk to issue writs of execution with respect to these assets. The court issued the writ of execution on June 12, 2017. As of the time of this letter, JPMorgan's counsel advises that, to his knowledge, no writs of execution have been served on JPMorgan. As noted in our status letter last month, according to JPMorgan's counsel, even after writs are served, a turnover proceeding, including a possible interpleader proceeding, will be required to determine whether the two accounts in question are subject to execution under governing law and whether any other parties with an interest in one or the other of the assets have a superior claim to the asset.

Accordingly, the Parties respectfully request that this action remain stayed pending the outcome of future turnover proceedings.

Respectfully,
DLA Piper LLP (US)



Richard M. Kremen
Partner

cc: All counsel of record via ECF